

IN THE DISTRICT COURT OF MCINTOSH COUNTY
STATE OF OKLAHOMA

FILED
APR 19 2021

LISA RODEBUSH, Court Clerk
McINTOSH COUNTY
By [Signature] Deputy

CASE NO. CJ-21-26

LEIRA BOWERMAN,

Plaintiff,

v.

OLSSON, INC., a foreign corporation,

Defendant.

PETITION

COMES NOW the Plaintiff, Leira Bowerman, and for her cause of action against the Defendant, Olsson, Inc., alleges and states as follows:

1. The Defendant is a foreign corporation organized under the laws of Nebraska. It is an engineering firm which inspects turnpikes in Oklahoma. Its registered service agent is Registered Agents, Inc., 3030 Northwest Expressway, Suite 200B, Oklahoma City, OK 73112.
2. On Sunday, April 21, 2019, at approximately 1:08 p.m., the Plaintiff, Leira Bowerman, was driving a 2015 white Chevrolet Eco Van in a southerly direction on the Indian Nation Turnpike, at mile marker 84, in McIntosh County, Oklahoma. On that date, and at that time and place, the Plaintiff struck a metal plate, which was dangerously sticking up in her lane of travel, in an expansion joint on a bridge. When the Plaintiff struck the metal plate, she ran off the road, and down an embankment, and rolled several times in her van.
3. The Plaintiff received severe, permanent, painful, and disabling injuries which have caused her to miss work, and have also caused her to incur medical expenses. The Plaintiff will suffer severe and excruciating pain and

EXHIBIT

tabbies

anguish in the future. She will also be required to have future medical treatment for her injuries, and incur future medical expenses. The Plaintiff will be unable to work in the future, and has suffered impairment to her earning capacity.

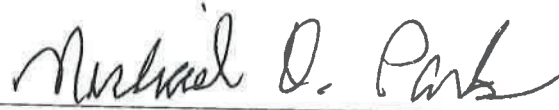
4. The Defendant, Olsson, Inc., was hired to inspect turnpikes and bridges in Oklahoma by the Oklahoma Turnpike Authority.
5. Plaintiff's injuries were directly caused by the negligence of the Defendant for failure to warn of the unsafe condition; failure to properly inspect and report to the Oklahoma Turnpike Authority; and for failure to maintain the plate involved in the wreck.
6. Plaintiff is 38 years old and a female of that age has an average future life expectancy of 42.5 years according to the 1991 Life Tables published by the United States Department of Health and Human Services.

WHEREFORE, premises considered, the Plaintiff, Leira Bowerman, prays for judgment against the Defendant, Olsson, Inc., in an amount in excess of that required for diversity jurisdiction pursuant to § 1332 of Title 28 of the United States Code, and such further and other relief to which she may show herself entitled.

Respectfully Submitted,

ATTORNEY'S LIEN CLAIMED

By:



Michael D. Parks, OBA #6904
10 E. Washington, Suite 102
P.O. Box 3220
McAlester, OK 74502
(918) 426-1818; (918) 426-1836 FAX
mike@mikeparkslaw.com
ATTORNEY FOR PLAINTIFF,
LEIRA BOWERMAN